

AMENDMENT TO APPLICATION OF CHARLES A. FARMER

**ELIZABETH FARMER (PERSONAL REPRESENTATIVE OF
THE ESTATE OF CHARLES A. FARMER)**

**FCC FILE NO. BPH-920518MA - MM DOCKET NO. 93-301
ILWACO, WASHINGTON**

EXHIBIT ONE

STATUS OF ELIZABETH FARMER

Charles A. Farmer passed away. His Last Will and Testament establishes Elizabeth Farmer as the personal representative of the Estate of Charles A. Farmer. Accordingly, Elizabeth Farmer seeks to continue the prosecution of this application for a new FM broadcast station on Channel 280C3 in Ilwaco, Washington, as the personal representative of the Estate of Charles A. Farmer. Elizabeth Farmer is the wife of Charles A. Farmer. The application of Charles A. Farmer was submitted as the application of an individual.

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EXHIBIT TWO

OWNERSHIP STATEMENT

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EXHIBIT TWO

OWNERSHIP STATEMENT

Elizabeth Farmer, personal representative of Charles A. Farmer (deceased) owns 100% of the common, voting stock of Lower Columbia Broadcasting Company, Inc., licensee of radio stations KVAS-AM, Astoria, Oregon and KKEE-FM, Long Beach, Washington. Elizabeth Farmer, in her capacity as personal representative of the Estate of Charles A. Farmer, also owns 60% of the common, voting stock of Coast Broadcasting Company, Inc., licensee of KCST-AM and KCST-FM, Florence, Oregon.

Other than the interests disclosed above, Elizabeth Farmer, as personal representative of the Estate of Charles A. Farmer, has no other interest in or connection with any other medium of mass communications. Neither Lower Columbia Broadcasting Company, Inc. nor Coast Broadcasting Company, Inc. have any other interests in or connections with any other medium of mass communications.

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EXHIBIT THREE

**ATTRIBUTABLE BROADCAST INTERESTS
47 C.F.R. SECTION 73.3555(a)**

AMENDMENT TO APPLICATION OF CHARLES A. FARMER

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EXHIBIT THREE

**ATTRIBUTABLE BROADCAST INTERESTS
47 C.F.R. SECTION 73.3555(a)**

Lower Columbia Broadcasting Company, Inc. is the licensee of radio stations KVAS-AM, Astoria, Oregon and KKEE-FM, Long Beach, Washington. Elizabeth Farmer, as personal representative of the Estate of Charles A. Farmer, owns 100% of the common, voting stock of Lower Columbia Broadcasting Company, Inc.

The principle city contour and the city grade contour of KVAS-AM and KKEE-FM will, respectively, overlap the signal of the proposed new FM facility in Ilwaco, Washington. A duopoly study was previously conducted. It demonstrated that the ownership of KVAS-AM and KKEE-FM fully complied with Section 73.3555(a) of the Commission's Rules. For reference, a copy of that duopoly study is attached to this Exhibit Three.



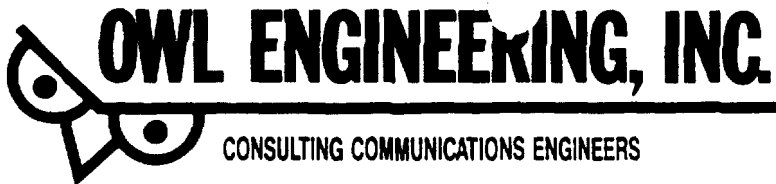
OWL ENGINEERING, INC.

CONSULTING COMMUNICATIONS ENGINEERS

1306 W. County Road F, St. Paul, MN 55112
(612) 631-1338 • Fax (612) 631-3502

**ENGINEERING STUDY ON BEHALF OF
CHARLES FARMER
RADIO MARKET ANALYSIS**

May 24, 1993



CONSULTING COMMUNICATIONS ENGINEERS

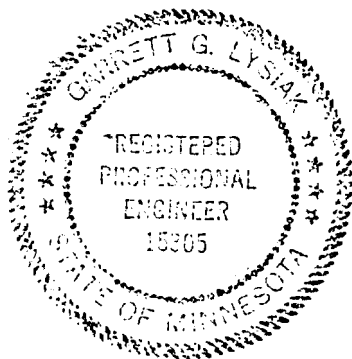
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ENGINEERING STUDY ON BEHALF OF
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AFFIDAVIT

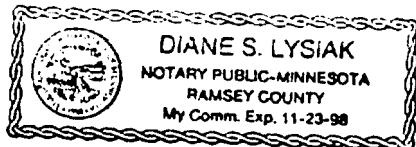
RAMSEY COUNTY)
)
STATE OF MINNESOTA) ss:

Garrett G. Lysiak, being first duly sworn, says that he is president of Owl Engineering, Inc., consulting communications engineers with offices in Arden Hills, Minnesota: that his qualifications as an expert in communications engineering are a matter of record with the Federal Communications Commission: that the foregoing exhibit was prepared by him and under his direction; and that the statements contained therein are true of his own *personal knowledge except those stated to information and belief and, as to those statements, verily believes them to be true and correct.



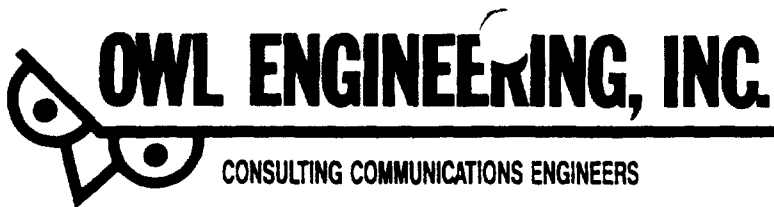
Garrett G. Lysiak, P.E.

Subscribed and sworn to before me this date May 24, 1993



Diane S. Lysiak
Notary Public

My commission expires November 23, 1998



CONSULTING COMMUNICATIONS ENGINEERS

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CHARLES FARMER
RADIO MARKET ANALYSIS**

Owl Engineering, Inc. has been retained by Charles Farmer (hereafter Farmer) to complete this radio market analysis. This study was completed to determine the number of AM and FM broadcast stations located in the competitive market consisting of radio stations KKEE, KVAS and Farmer's proposed new FM station at Ilwaco, Washington.

To determine which stations are located in a given competitive market, the appropriate principal community coverage contours of all broadcast stations in the vicinity of Ilwaco must be calculated and a determination must be made if there exists any overlap of these contours. Each station involved in coverage overlap is included in the market count. The 3.16 mV/m (70 dBu) contour level is utilized when studying overlap of FM stations. The 5 mV/m contour level is utilized when studying overlap of AM stations. The coverage contours for KKEE, KVAS and Farmer's proposed new FM station were calculated and are included in Engineering Exhibit E-1 for reference.

A comprehensive search of all FM broadcast stations surrounding the Ilwaco area was conducted. The 70 dBu contour for each station was calculated for each of the eight standard 45-degree spaced radials in conjunction with the F(50,50) metric curves of Figure 1 of Section 73.333 of the Commissions Rules. The results of the search are shown in Engineering Exhibit E-2. It was determined that two (2) additional FM stations serve the Ilwaco area market and are listed below.



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<u>Call</u>	<u>Community of License</u>
KASTFM	Astoria, WA
KMNT	Centralia, WA

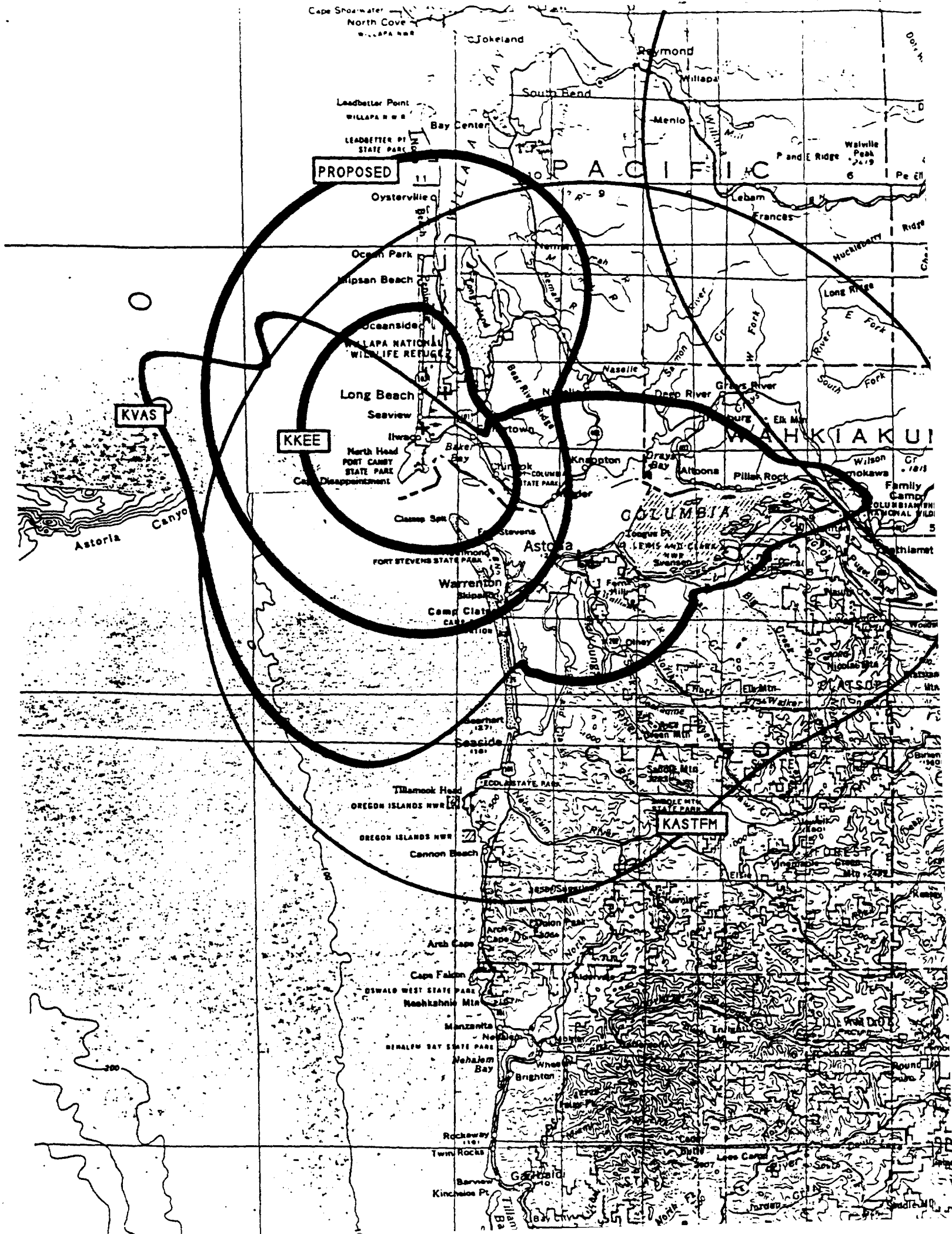
A comprehensive search of all AM broadcast stations surrounding the Ilwaco area was conducted. The 5 mV/m contour for each station was calculated every 5 degrees using the FCC metric curves and the M3 map conductivity data. The results of the search are shown in Engineering Exhibit E-3. It was determined that two (2) additional AM stations serve the Ilwaco area market and are listed below.

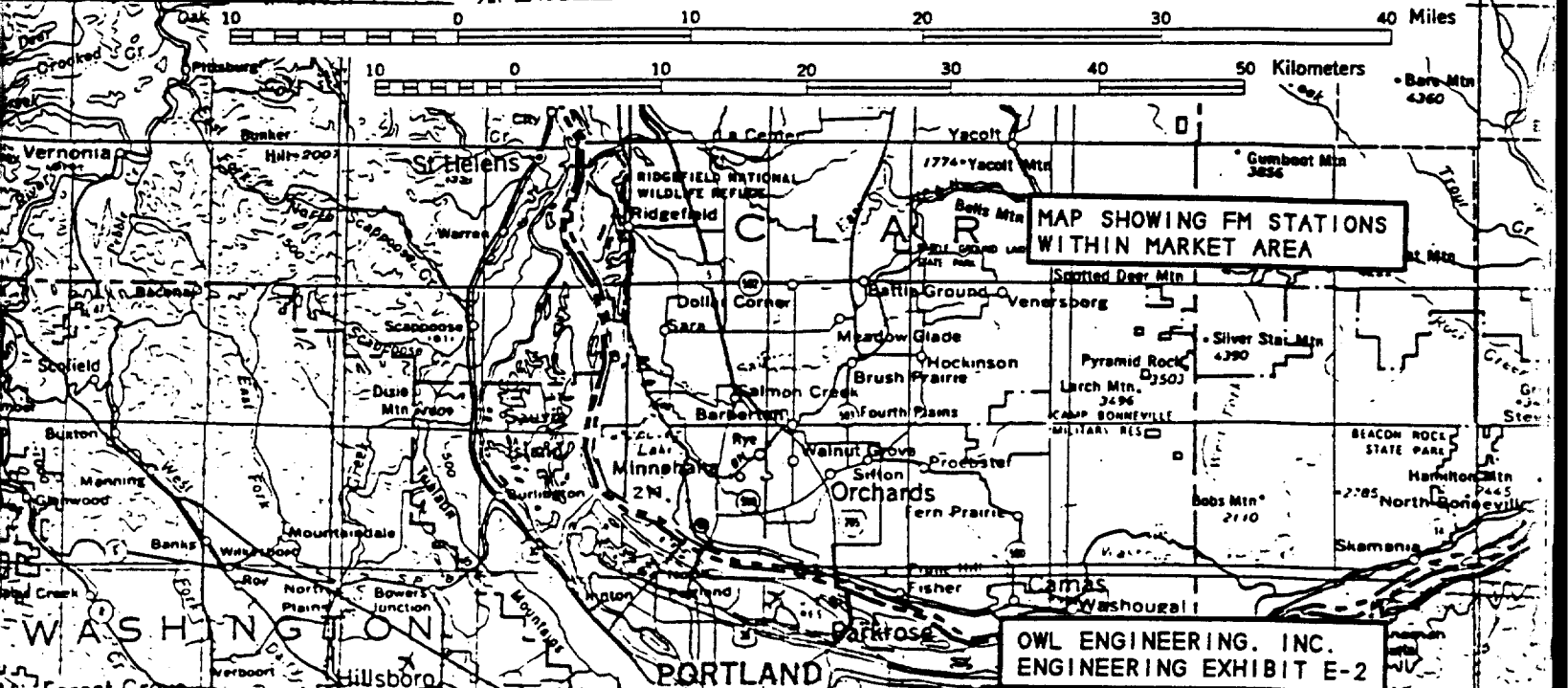
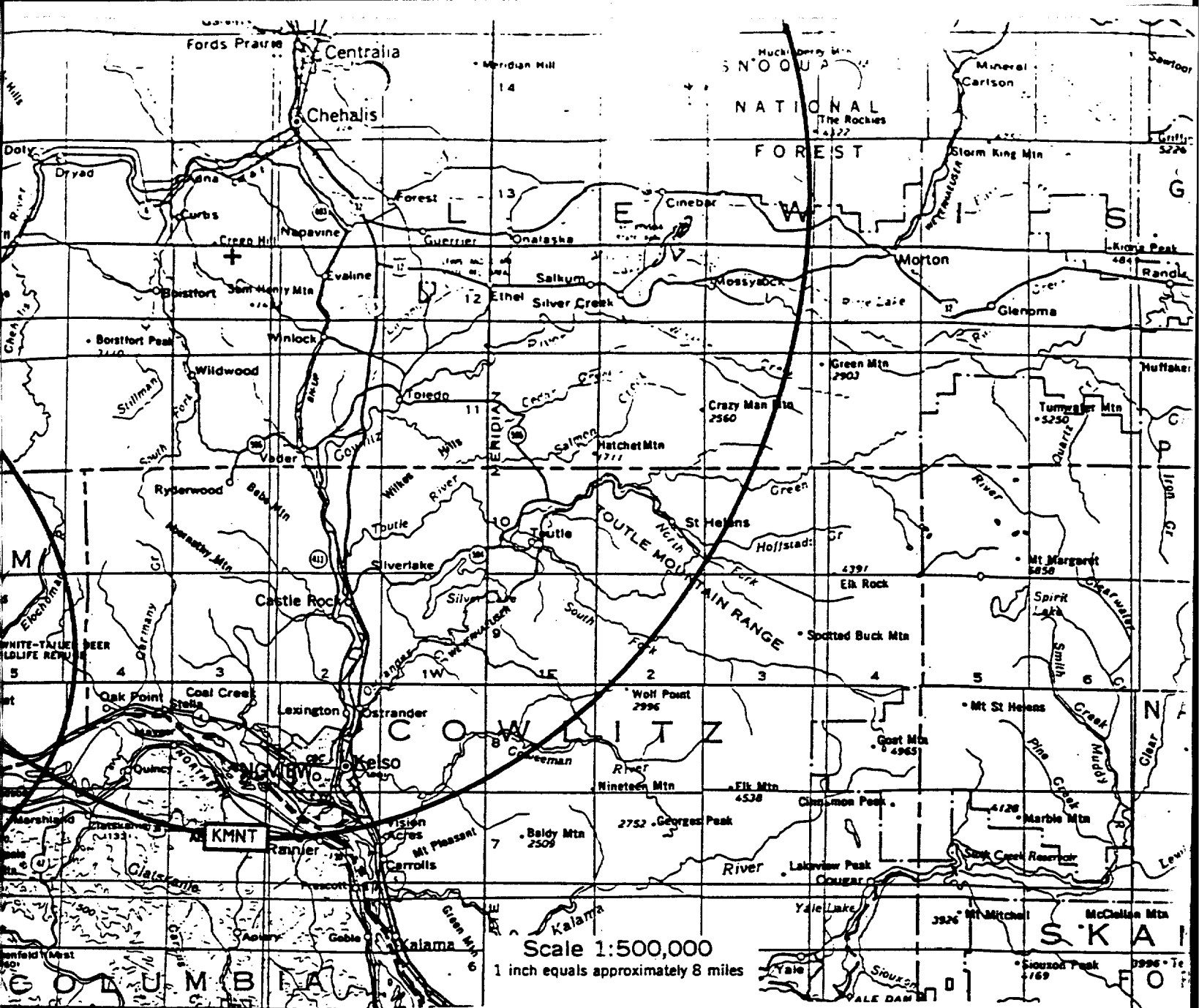
<u>Call</u>	<u>Community of License</u>
KAST	Astoria, WA
KSWB	Seaside, OR

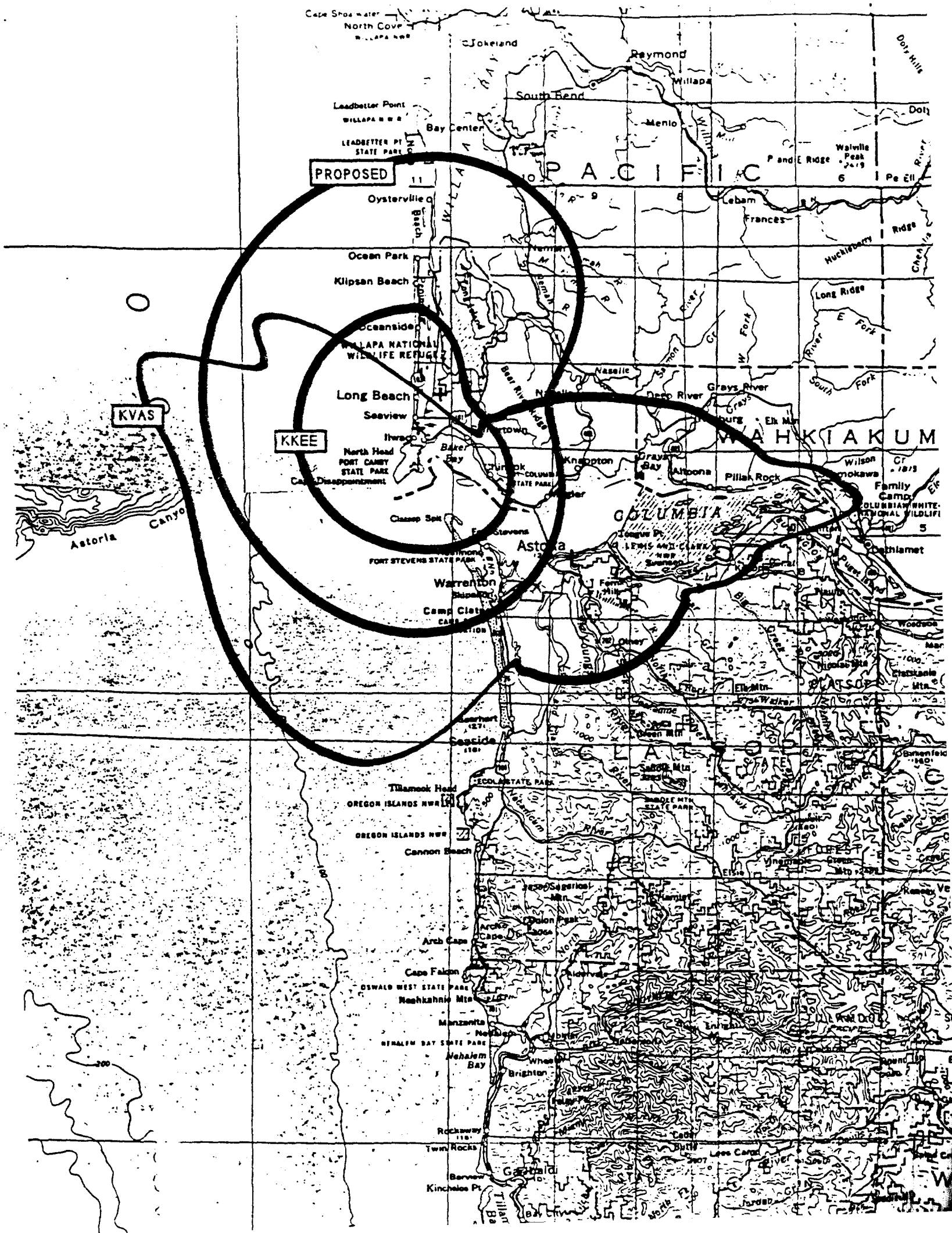
Based on the above findings, it can be determined that a total of seven (7) AM and FM broadcast stations serve the Ilwaco area market. Radio stations KKEE, KVAS and Farmer's proposed new FM station represent forty three (43) percent of this market.

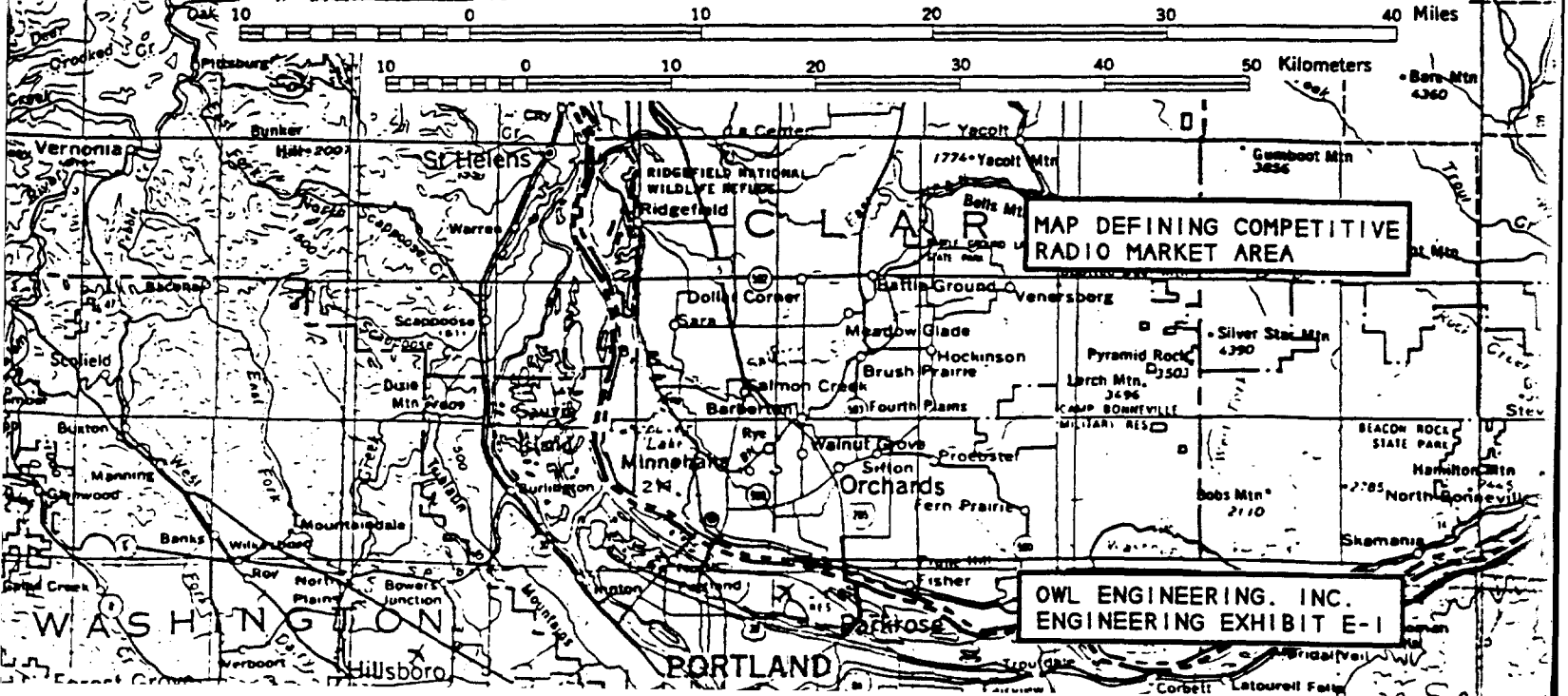
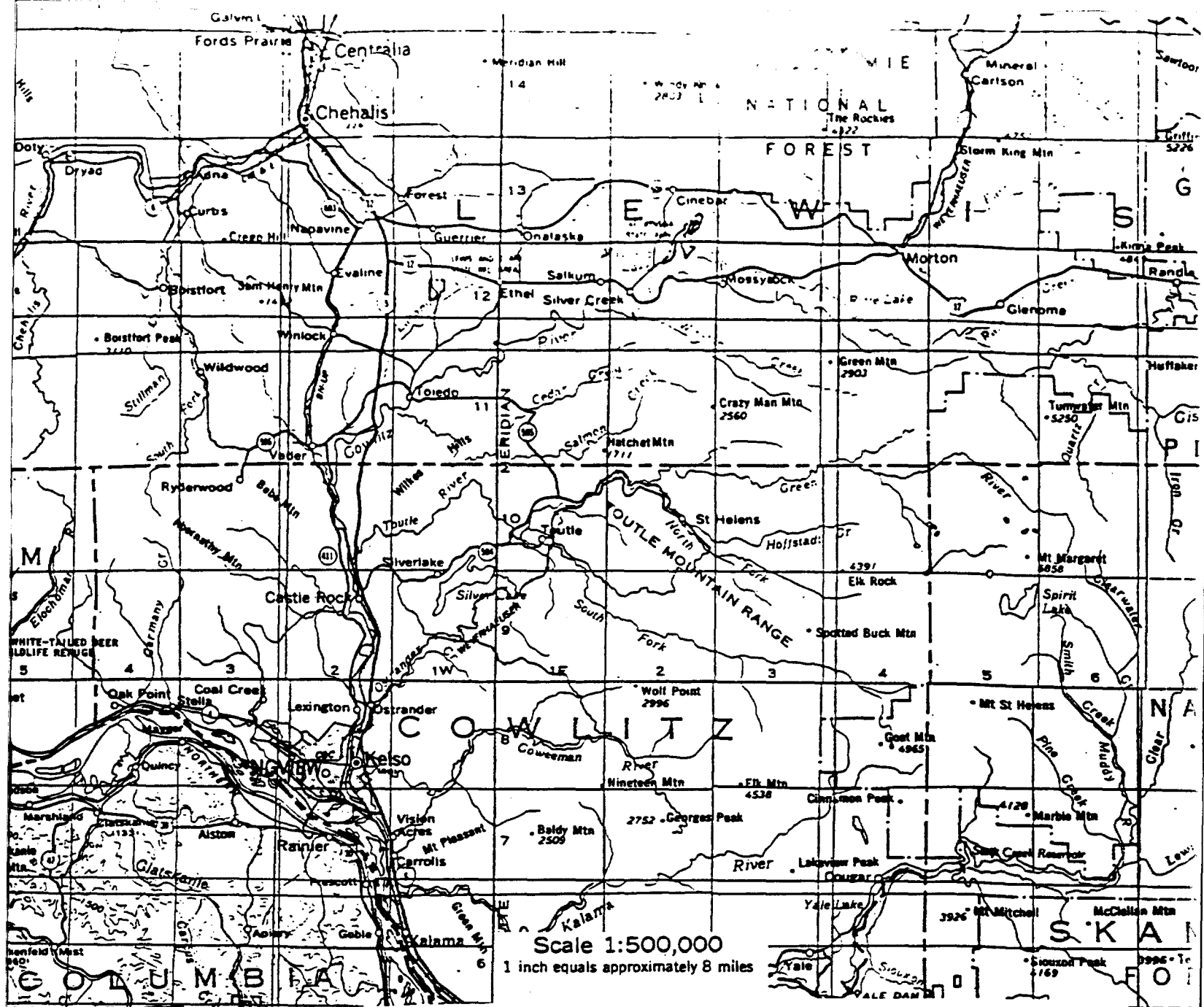
It is worth noting that radio stations KQEM at Seaside, OR and KSWW at Raymond, WA currently hold Construction Permits and will count in the market totals when they are operational. KQEM and KSWW will not affect the outcome of the radio market analysis once operations begin.

It is also worth noting that radio station KTIL(AM) at Tillamook, OR was analyzed and it was determined that KTIL's 5 mV/m contour would overlap the 5 mV/m contour of KVAS. However, the overlap area extends entirely over the Pacific Ocean and as a consequence was not counted in the market total.



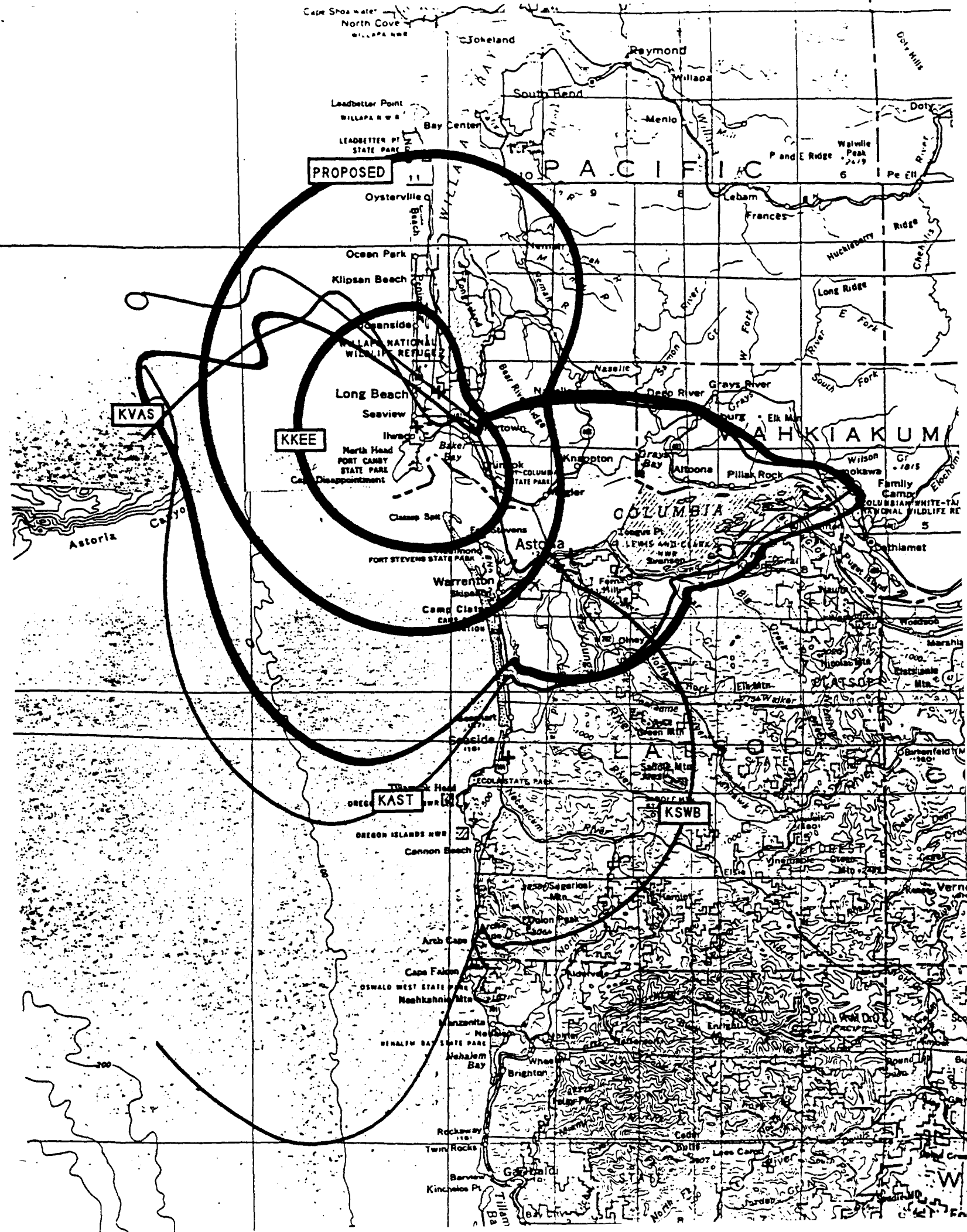






MAP DEFINING COMPETITIVE
RADIO MARKET AREA

OWL ENGINEERING, INC.
ENGINEERING EXHIBIT E-1



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EXHIBIT FOUR

INTEGRATION STATEMENT

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EXHIBIT FOUR

INTEGRATION STATEMENT

The Application of Charles A. Farmer was subjected to the "freeze" associated with new FM applications which were mutually exclusive with other applications.

The Hearing Designation Order in this proceeding was released on December 14, 1993. Charles A. Farmer filed his Notice of Appearance on January 3, 1994. Prior to the inception of the "freeze", the parties in this case proceeded to the submission of their "Integration and Diversification Statements" and began the task of document production. Notices of Intent to Take Oral Depositions were filed and then the case was frozen.

The above background is given to make it easier for the presiding judge to track the events of this case. As far as the required "Integration and Diversification Statement" is concerned, Charles A. Farmer filed his statement on January 4, 1994. In that "Integration and Diversification Statement", Charles A. Farmer indicated that he owned 100% of the applicant for Channel 280C3 at Ilwaco, Washington and also controlled all of the affairs of the applicant.

Numerous representations regarding integration and other broadcast interests were made in that "Integration and Diversification Statement". Under the current status of mutually exclusive applications for new broadcast facilities, it is unclear how the presiding judge would wish for an amendment regarding the "Integration and Diversification Statement" of Charles A. Farmer be treated. In light of the fact that the Commissions' Rules are unclear with respect to how it intends to proceed regarding integration and

diversification of applicants in new FM proceedings, it would seem that an amendment of the "Integration and Diversification Statement" would be superfluous. However, Elizabeth Farmer, personal representative of the Estate of Charles A. Farmer, would appreciate the presiding judge's guidance with respect to whether or not it would be appropriate for her to amend the "Integration and Diversification Statement" of Charles A. Farmer.

CERTIFICATE OF SERVICE

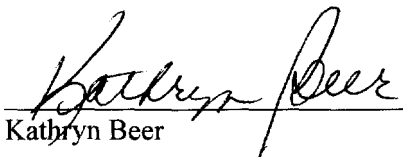
I, Kathryn Beer, a secretary in the Law Offices of Richard J. Hayes, Jr., hereby certify that I have, on this 21st day of July, 1997, caused to be delivered or mailed via first-class United States mail, postage prepaid, copies of the foregoing to the persons named, below:

The Honorable Edward Luton
Administrative Law Judge
Federal Communications Commission
2000 L Street N.W. -- Room 221
Washington, D.C. 20554

Paulette Iaden, Esq.
Mass Media Bureau
Federal Communications Commission
2025 M Street N.W. -- Room 7212
Washington, D.C. 20554

Chief, Data Management Staff
Audio Services Division
Mass Media Bureau
Federal Communications Commission
1919 M Street N.W. -- Room 315
Washington, D.C. 20554

Peter Gutmann, Esq.
Pepper & Corazzini
200 Montgomery Building
1776 K Street N.W. -- Suite 200
Washington, D.C. 20006


Kathryn Beer